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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL  
PROTECTION REGARDING DRAFT SAMPLING AND ANALYSIS PLAN FOR INTERIM  
MEASURE PERFORMANCE SPECIFICATIONS NS MAYPORT FL  
8/8/1996  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

# Department of Environmental Protection

Lawton Chiles  
Governor

Twin Towers Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Virginia B. Wetherell  
Secretary

August 8, 1996

Mr. David Driggers  
Department of the Navy, Southern Division  
Naval Facilities Engineering Command  
2155 Eagle Drive, PO Box 190010  
North Charleston, SC 29419-9010

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RE: Draft Sampling and Analysis Plan for Interim Measure Performance Specifications, US  
Naval Station Mayport

Dear David:

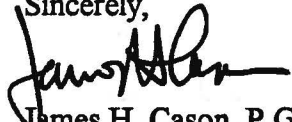
I have reviewed the subject Sampling and Analysis Plan dated July 3, 1996 (received July 8, 1996) and offer the following comments which should be considered in preparing the final draft.

1. I suggest that the Navy consider conducting analysis for pesticides and PCBs at least on selected soil samples from the area of the burn activities at SWMU 14. My reasoning is that these materials were often disposed of using the fire training activities at military bases and that residual concentrations may reasonably be expected to be located in the proposed sampling sites even though they were not observed in the immediate site vicinity.
2. The proposed sampling at SWMUs 23, 24 and 25 to assess specific contamination at "hot spots" appears to depend on the observation of visual criteria such as stressed vegetation and staining. I question the validity of the relationship of a visual surface expression for the contaminants of concern. Do the compounds of interest manifest such surface effects at the concentrations that we can reasonably expect to find? Since the assessment concerns "hot spots," should a statistical sampling plan with preference to visual occurrences be followed? If we are assessing known "hot spots" these comments may not be appropriate, but additional explanation of the assessment seems necessary.
3. Should the analysis of the soil samples at SWMU 24 include metals such as lead since it was formerly part of the old firing range? I realize that prior sampling has indicated that PAHs were the problem materials, perhaps not even actually related to the former site land use; but simply because it was a firing range, should we not also obtain this information?

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Thank you for the opportunity to review this sampling plan. If you have questions or require further clarification, please contact me at (904) 921-4230.

Sincerely,



James H. Cason, P.G.  
Remedial Project Manager

cc: Cheryl Mitchell, NAVSTA Mayport  
Martha Berry, EPA Region IV, Atlanta  
Frank Lesesne, ABB Environmental Services, Tallahassee  
Satish Kastury, FDEP, Tallahassee  
Brian Cheary, FDEP Northeast District, Jacksonville

TB B JJC for JC ESN ESN